

BROOKSIDE PARK CONDOMINIUMS

**500 Wilson Bridge Drive
Oxon Hill, MD 20745
Phone: (301) 567-5000**

Jul 20, 2024

Sgt. Lester Lee
564 Willson Bridge Drive D-2
Oxon Hill, MD 20745

Dear Sgt. Lee

The Board of Directors of Brookside Park Condominium, Inc. is in receipt of your letter dated April 1, 2024 and addressed to our Agent, Metropolis Management, regarding your request for special accommodations for your Staffordshire Bull Terrier, MaMa, and your Pit Bull Terrier, Cashmere, under the Fair Housing Act.

As you know, the keeping of pit bull-type animals, such as MaMa and Cashmere is explicitly disallowed by Brookside. Prince George's County also prohibits owning or keeping Pit Bull Terriers (including Staffordshire Bull Terriers).

The Board of Directors recognizes, however, that reasonable accommodations may be requested and granted under the Fair Housing Act on an exceptional basis, even if they go against our Rules or County Ordinance. In making our decision, we must consider the circumstances and corroborating information supporting the request, as well as the impact to the Brookside community at large before that request is granted. In addition to the information provided by the requestor, we also must consider other information available to us.

In this instance, although you provide no supporting data (e.g. a verification letter from a healthcare provider attesting to your disability and the need for this accommodation) the Board is making a decision to deny your special accommodation request based on factors not related to your stated medical condition or need. The Board is denying your request for the following reasons:

1. Although you request special dispensation for two animals, MaMa and Cashmere, you fail to disclose that, in fact, you keep several pitbull terriers in your apartment. In fact, it is our understanding that you have been breeding and selling pit bull terriers out of your Brookside apartment for several years, as attested by your landlord, many of your neighbors, and at least one Brookside resident that you approached and offered to sell one of your puppies. This is a violation of Article X of the Brookside bylaws.
2. There have been numerous documented complaints from several of your neighbors about dogs defecating and urinating on the balcony of your unit, and the feces and urine



dripping and damaging the units below as well as the grassy common elements adjacent to your unit. This is a violation of Article X of the Brookside bylaws.

3. There have been numerous complaints from your neighbors below about the stench of dog urine permeating the stairwells, the balconies, and reaching the interior of their units (including their living room and bathroom). This situation is clearly the result of your keeping a large number of animals in the confined space of your unit, and allowing them to urinate/defecate inside your unit. Moreover, smelly liquids have repeatedly leaked through your floorboard to the ceilings of the units below, causing damage and concern as to the nature of the smelly leaks.
4. There have been numerous documented disturbance noise complaints from several of your neighbors pertaining to your dogs howling and barking at all hours of the day and night, suggesting they are often left confined and unattended. This is a violation of Article X of the Brookside bylaws.
5. There is a documented police record of one of your pit bull dogs randomly attacking and killing another resident's pet while they were walking it in the community. Consequently, several neighbors have reported living in fear of your aggressive dogs attacking them or their pets. This is a violation of Article X of the Brookside bylaws.
6. You and your landlord have been cited for allowing your dog(s) to roam the community unleashed on more than one occasion in violation of Article X of the Brookside bylaws.
7. We have repeatedly requested of you and your landlord to inspect your unit, in accordance with the Brookside inspection program, and have heretofore been unable to do so.
8. You are renting your apartment without the required rental license from Prince George's County Department of Permitting Inspections and Enforcement (DPIE). There is no lease on file with the Brookside Condominium Office as required by the bylaws. DPIE has been unable to get a response from you or your landlord about the lack of a proper rental license, and the requirement to have your unit inspected by DPIE.


The violations enumerated above are unrelated to your stated medical condition. They are serious and pose a significant safety and health hazard to the Brookside Community at large, and to your neighbors in particular. Your refusal to respond to and address the concerns of your neighbors directly resulting from your actions of keeping and breeding numerous pit bull-type animals inside your apartment is affecting their well being, the value of their property and the general welfare of Brookside.

Consequently, your request for special accommodations for your Staffordshire Bull Terrier, MaMa, and your Pit Bull Terrier, Cashmere, is hereby denied. You may appeal this decision by submitting a written request for a hearing with the Board of Directors.

A copy of the Brookside Bylaws is attached for your reference.

Best regards,

Robert Haddad, President
Brookside Park Condominium, Inc.


CC: Board of Directors
Anthony Dwyer, Esq.
Charles Gormly, Esq.
Ben Colbert, Metropolis Management
Rammy Azoulay, Metropolis Management
Charles Savoy